

David B. Picker, Esquire [DP-9658]
SPECTOR GADON & ROSEN, P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
(215) 241-8888 / FAX- (215) 241-8844
Lead Counsel For Defendant

David N. Mair [DM-8883]
KAISER SAURBORN & MAIR, P.C.
111 Broadway
New York, New York 10006
Tel: 212-338-9100 / FAX- 212-338-9088
Local Counsel For Defendant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFERSON CITY COMMONS, LLC

Plaintiff,

v.

MORAN FOODS, INC. d/b/a
SAVE-A-LOT, LTD.,

Defendant.

Docket No. **08 Civ. 4866 (LAK)**

**MOTION FOR
PRO HAC VICE ADMISSION**

PLEASE TAKE NOTICE that, upon the Declaration of David B. Picker, dated June 3, 2008, the Declaration of Suzanne Ilene Schiller, dated June 3, 2008 and the Exhibits attached thereto, the undersigned hereby moves this Court, pursuant to Local Civil Rule 1.3(c), for an Order admitting Suzanne Ilene Schiller *pro hac vic*, for purposes of representing Defendant Moran Foods, Inc. d/b/a Save-A-Lot, Ltd. ("Sav-A-Lot") for all purposes in this action.


Applicant's Name: Suzanne Ilene Schiller
Firm Name: Spector Gadon & Rosen, P.C.
Address: 1635 Market Street, 7th Floor, Philadelphia, PA 19103
Phone No.: 215-241-8888

Fax No.: 215-241-8844

Date: June 3, 2008
Philadelphia, PA

Respectfully submitted,

SPECTOR GADON & ROSEN, PC

By: 
David B. Picker, Esquire [DP-9658]
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888 / FAX- 215-241-8844

David Mair, Esquire [DM-8883]
KAISER SAURBORN & MAIR, PC
111 Broadway
New York, NY 10006
212-338-9100 / FAX- 212-338-9088
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFERSON CITY COMMONS, LLC	:	
	:	Docket No. 08 Civ. 4866 (LAK)
Plaintiff,	:	
v.	:	
MORAN FOODS, INC. d/b/a	:	ORDER FOR ADMISSION
SAVE-A-LOT, LTD.,	:	<u>PRO HAC VICE</u>
	:	
Defendant.	:	

Upon the Motion of David B. Picker, attorney for Defendant Moran Foods, Inc. d/b/a Save-A-Lot, Ltd. ("Sav-A-Lot"), the supporting Declaration of David B. Picker, and the Declaration of Suzanne Ilene Schiller and the Exhibits attached thereto;

IT IS HEREBY ORDERED that

Applicant's Name: Suzanne Ilene Schiller
Firm Name: Spector Gadon & Rosen, P.C.
Address: 1635 Market Street, 7th Floor, Philadelphia, PA 19103
Phone No.: 215-241-8888
Fax No.: 215-241-8844

is admitted to practice *pro hac vice* as counsel for Defendant Save-A-Lot in the above captioned case in this Court. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac*

vice fee to the Clerk of Court.

Date: _____, 2008
New York, New York

_____, U.S.D.J.

David B. Picker, Esquire [DP-9658]
 SPECTOR GADON & ROSEN, P.C.
 1635 Market Street, 7th Floor
 Philadelphia, PA 19103
 (215) 241-8888 / FAX- (215) 241-8844
Local Counsel for Defendant

David N. Mair [DM-8883]
 KAISER SAURBORN & MAIR, P.C.
 111 Broadway
 New York, New York 10006
 Tel: 212-338-9100 / FAX- 212-338-9088
Local Counsel for Defendant

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

JEFFERSON CITY COMMONS, LLC	:	
	:	Docket No. 08 Civ. 4866 (LAK)
Plaintiff,	:	
v.	:	
	:	
MORAN FOODS, INC. d/b/a	:	DECLARATION OF DAVID B.
SAVE-A-LOT, LTD.,	:	PICKER IN SUPPORT
	:	OF MOTION FOR
Defendant.	:	<u>ADMISSION PRO HAC VICE</u>

COMMONWEALTH OF PENNSYLVANIA	:
	: ss.:
COUNTY OF PHILADELPHIA	:

DAVID B. PICKER, pursuant to 28 U.S.C. §1746, declares and affirms as follows:

1. I am an attorney associated with the firm of Spector Gadon & Rosen, P.C. I am duly licensed to practice law in the State of New York, having been admitted to the Bar of New York on September 18, 1981. I am also a member in good standing of the Bar of this Court, having been admitted to practice before the Southern and Eastern Districts of New York on December 14, 1982.

2. I submit this declaration in support of the admission to this Court *pro hac vice* of Suzanne Ilene Schiller, pursuant to Local Rule 1.3(c), to help represent Defendant Moran Foods, Inc. d/b/a Save-A-Lot, Ltd. ("Sav-A-Lot") in this litigation.

3. Ms. Schiller is a member in good standing of the Bars of California, Pennsylvania, and New Jersey, as well as the United States District Courts for the Southern, Central, Northern and Eastern Districts of California, the Eastern and Middle Districts of Pennsylvania, and the District of New Jersey, as well as the United States Court of Appeals for the Third Circuit. She has not been subjected to any order of suspension or disbarment.

4. I have known and worked with Ms. Schiller since 1998. During that time, I have found her to be an attorney of high professional skill and integrity. She is experienced in federal practice and the Federal Rules of Civil Procedure.

5. Wherefore, I respectfully request that Ms. Schiller be admitted *pro hac vice* to represent Save-A-Lot in this action, together with myself and David N. Mair, Esquire of the law firm Kaiser Saurborn & Mair, P.C..

6. I declare under penalties of perjury that the foregoing is true and correct.

Date: June 3, 2008
Philadelphia, PA



DAVID B. PICKER

David B. Picker, Esquire [DP-9658]
SPECTOR GADON & ROSEN, P.C.
1635 Market Street, 7th Floor
Philadelphia, PA 19103
(215) 241-8888 / FAX- (215) 241-8844
Lead Counsel for Defendant

David N. Mair [DM-8883]
KAISER SAURBORN & MAIR, P.C.
111 Broadway
New York, New York 10005
(212) 338-9100 / FAX- 212-338-9038
Local Counsel for Defendant

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFERSON CITY COMMONS, LLC :

Plaintiff, :

v. :

MORAN FOODS, INC. d/b/a :
SAVE-A-LOT, LTD., :

Defendant. :

Docket No. **08 Civ. 4668 (LAK)**

**DECLARATION IN SUPPORT
OF MOTION FOR
ADMISSION PRO HAC VICE**

COMMONWEALTH OF PENNSYLVANIA :

: ss.:

COUNTY OF PHILADELPHIA :

SUZANNE ILENE SCHILLER, pursuant to 28 U.S.C. §1746, declares and affirms as follows:

1. I am an attorney and member of the firm of Spector Gadon & Rosen, P.C., with offices located at 1635 Market Street, 7th Floor, Philadelphia, Pennsylvania 19103, Tel.- (215) 241-8888, and Fax- (215) 241-8844.

2. I submit this declaration in support of the motion for my admission to this Court *pro hac vice*, pursuant to Local Rule 1.3(c), to represent Defendant Moran Foods, Inc. d/b/a Save-A-Lot, Ltd. ("Save-A-Lot") in connection with this litigation.

3. I was admitted to practice law in the states of California in 1987, Pennsylvania in 1993, and New Jersey in 1997. I have also been admitted to practice in the United States District Courts for the Southern, Central, Northern and Eastern Districts of California, the Eastern and Middle Districts of Pennsylvania, and the District of New Jersey, as well as the United States Court of Appeals for the Third Circuit.

4. I am a member in good standing in each of these jurisdictions. Attached hereto as Exhibit A are recent certificates of good standing from California, Pennsylvania, and New Jersey.

5. I am not currently and have never been suspended or disbarred in any jurisdiction, and there are no disciplinary matters pending against me.

6. Save-A-Lot has been a client of mine for many years, and wants me to appear for and help defend and otherwise represent it in this lawsuit.

7. Wherefore, I respectfully request that I be admitted *pro hac vice* to represent Save-A-Lot in this action, together with David B. Picker, Esquire, of the law firm of Spector Gadon & Rosen, P.C. and David N. Mair, Esquire of the law firm Kaiser Saurborn & Mair, P.C., both of whom are members in good standing of the bar of this Court.

6. I declare under penalties of perjury that the foregoing is true and correct.

Date: June 3, 2008
Philadelphia, PA


SUZANNE ILENE SCHILLER

Supreme Court of New Jersey

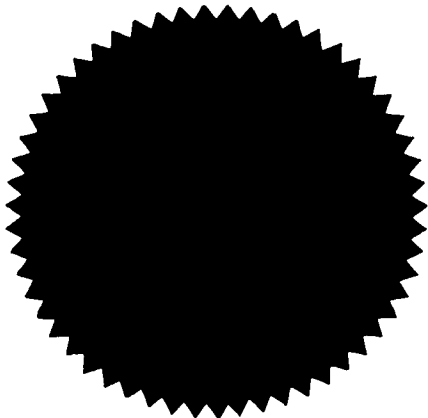


Certificate of Good Standing

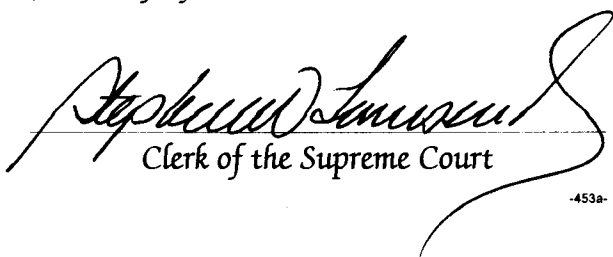
This is to certify that **SUZANNE ILENE SCHILLER**
(No. **000931997**) was constituted and appointed an Attorney at Law of New
Jersey on **May 28, 1997** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
21ST day of May, 20 08


Clerk of the Supreme Court



Supreme Court of Pennsylvania

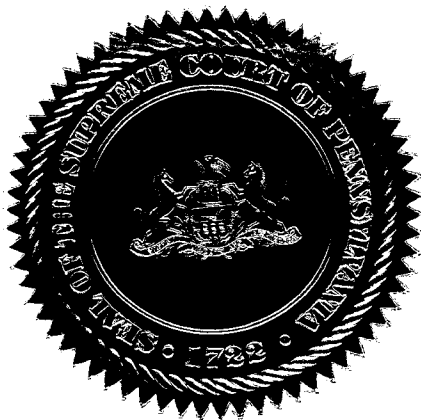
CERTIFICATE OF GOOD STANDING

Suzanne Ilene Schiller, Esq.

DATE OF ADMISSION

June 2, 1993

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: May 20, 2008

A handwritten signature in cursive script, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

May 20, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SUZANNE ILENE SCHILLER, #130682 was admitted to the practice of law in this state by the Supreme Court of California on December 14, 1987; that from the date of admission to January 1, 1996, she was an ACTIVE member of the State Bar of California; that on January 1, 1996, she transferred at her request to the INACTIVE status; that from that date to November 13, 2006, she was an INACTIVE member of the State Bar of California; that on November 13, 2006, she transferred at her request to the ACTIVE status; that she has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in dark ink, appearing to read "J. Robert McPhail", is written over a horizontal line.

J. Robert McPhail
Custodian of Membership Records

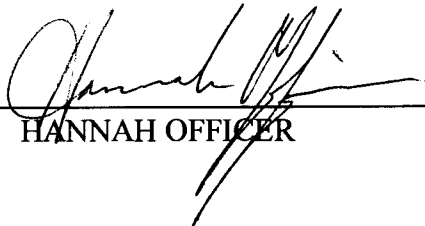
AFFIDAVIT OF SERVICE

I hereby certify under penalty of perjury, pursuant to 28 U.S.C. §1746, that on June 9, 2005, I caused a true copy of the within Motion for Pro Hac Vice Admission to be served on defendant by mailing a true copy of same to their offices via U.S. Mail, in a sealed envelope with postage prepaid thereon, addressed to::

David Jaroslawicz, Esq.
Jaroslawicz & Jaros, LLC
225 Broadway - 24th Floor
New York, NY 10007

This true copy was sent to the address referenced above by depositing the envelope in an official depository of the United States Postal Service within the State of New York.

Dated: New York, New York
June 5, 2008



HANNAH OFFICER